

### **REMARKS**

Claims 1-24 are all the claims presently pending in the application. Claims 5 and 23 have been amended to more particularly define the invention.

It is noted that the claim amendments are made only for more particularly pointing out the invention, and not for distinguishing the invention over the prior art, narrowing the claims or for any statutory requirements of patentability. Further, Applicant specifically states that no amendment to any claim herein should be construed as a disclaimer of any interest in or right to an equivalent of any element or feature of the amended claim.

Claims 5-14 and 23 stand rejected upon informalities (e.g., under 35 U.S.C. 112, first paragraph). Claims 1-11 and 15-24 stand rejected under 35 U.S.C. § 102(a) as being anticipated by Eisenstein, et al. Claims 12-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Eisenstein, et al.

These rejections are respectfully traversed in the following discussion.

#### **I. THE CLAIMED INVENTION**

As described and claimed, for example by claim 1, the present invention is directed to a method for emulating on a single display platform an application's user interface as it would appear on each of a number of target devices, given a set of device characteristics for any device to be emulated and a formal description of one or more applications to be emulated, including combining a selected one or more of the device characteristics and a selected one of the application formal descriptions.

A simultaneous and consistent display representation for the selected application is provided, thereby providing a stylized rendering of the selected application's interface in a uniform appearance and in which the selected application's interface for a plurality of the target devices can selectively be viewed simultaneously.

Conventional methods, such as described in Eisenstein, fail to have either the stylized rendering or the ability to simultaneously view more than one target device at the same time.

An important advantage of the present invention is that an interface developer can view on one display screen the result of modifying software features for an application and

see simultaneously the effects that each modification will cause for each target device. That is, there is no need to load a separate display application or a separate display window for seeing the effect on each target device, since the effects are shown simultaneously.

## **II. THE REJECTION BASED ON 35 USC §1.112, SECOND PARAGRAPH**

As best understood, the Examiner rejects claims 5 and 23 as being indefinite. Applicants are uncertain what exactly the Examiner is attempting to say, but have corrected terminology in claims 5 and 23 to be consistently "device-independent ~~model~~ specification information", rather than "device-independent model information".

Applicants intentionally decline to modify claim wording to precisely match the corresponding wording in the specification and point out that no such requirement exists. The only requirement is that one of ordinary skill in the art be able to understand the plain meaning of the language in order to understand the metes and bounds of the claim. Applicants submit that no confusion in terminology is present.

That is, relative to the terms "single format" and "polygonal area", Applicants intend that this terminology be construed in accordance with the plain meaning of these two-word descriptive phrases. Applicants submit that one of ordinary skill in the art would readily understand this terminology.

## **III. THE PRIOR ART REJECTION**

The Examiner alleges that Eisenstein anticipates the present invention as defined by claims 1-11 and 15-24 and renders obvious the present invention as defined by claims 12-14. Applicants submit, however, that there are at least two key elements of the claimed invention which are neither taught nor suggested by Eisenstein.

First, Eisenstein fails to teach, suggest, or even hint at providing a simultaneous display for a plurality of target devices. The Examiner relies on Figure 2 of page 71 of

Eisenstein and alleges that this figure "... *represents an object mapping that provides simultaneous and consistent display representation.*"

It is noted, first, that the claim language is clearing not claiming an "object mapping". It is noted, second, that Figure 2 represents only the concept of mapping. It does not, as the Examiner seems to consider, relate in any way to a simultaneous viewing of the three target devices. That is, the existence of a mapping does not in any way relate to the simultaneous presentation of the user interface for multiple target devices.

In contrast, the present invention could actually present, simultaneously, together, on a single display screen, a stylized representation of each of all three displays that would be seen on the PC, the PDA, and the cell phone.

Second, Eisenstein does not teach a "stylized representation", as this term is specifically defined beginning at line 7 of page 8 of the specification. Indeed, Eisenstein clearly teaches against such concept in the description beginning in the right column of page 71 and continuing through the third full paragraph in the left column of the next page.

Hence, turning to the clear language of the claims, in Eisenstein, there is no teaching or suggestion of: "... method for emulating on a single display platform an application's user interface as it would appear on each of a number of target devices, ... and providing a simultaneous and consistent display representation for said selected application, thereby providing a stylized rendering of said selected application's interface in a uniform appearance and in which said selected application's interface for a plurality of said target devices can selectively be viewed simultaneously", as required by claim 1.

The remaining independent claims has at least one of these distinguishing features.

Additionally, relative to claim 2, as well as other claims, the terminology "specific tasks" upon which the Examiner relies is not at all equivalent to "synchronized", as this term is defined on line 16 of page 3 of the specification. The term "specific tasks" is used in Eisenstein as describing the different roles of, for example, a cell phone versus a PDA, as clearly evident from the first sentence in the final paragraph on page 73: "So far we have assumed that on each device, the user will want to accomplish the same set of tasks."

Serial No. 09/852,281  
Docket No. YOR920010355US1

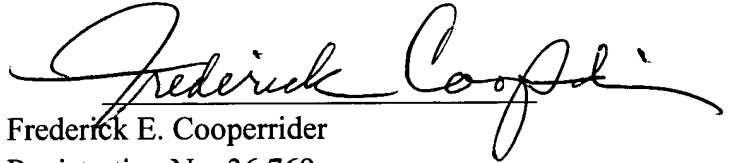
#### IV. FORMAL MATTERS AND CONCLUSION

In view of the foregoing, Applicant submits that claims 1-24, all the claims presently pending in the application, are patentably distinct over the prior art of record and are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue at the earliest possible time.

Should the Examiner find the application to be other than in condition for allowance, the Examiner is requested to contact the undersigned at the local telephone number listed below to discuss any other changes deemed necessary in a telephonic or personal interview. The Commissioner is hereby authorized to charge any deficiency in fees or to credit any overpayment in fees to Attorney's Deposit Account No. 50-0481.

Respectfully Submitted,

Date: 12/11/03



Frederick E. Cooperrider  
Registration No. 36,769

**McGinn & Gibb, PLLC**  
8321 Old Courthouse Road, Suite 200  
Vienna, VA 22182-3817  
(703) 761-4100  
**Customer No. 21254**